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6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 COOPERATIVE
10 ENTERTAINMENT, INC.

11 Plaintiff,

12 v.

13 RIPPLE LABS, INC.

14 Defendant.

15 Case No. 3:19-cv-06025-VC

16 **JOINT STIPULATION AND
[PROPOSED] ORDER TO
CONTINUE THE INITIAL CASE
MANAGEMENT CONFERENCE**

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Complaint Filed: September 25, 2019

1 Pursuant to this Court's Civil Standing Order ("Civil Order") ¶ 14, Plaintiff
 2 Cooperative Entertainment, Inc. ("Cooperative Entertainment") and defendant
 3 Ripple Labs, Inc. ("Ripple") (collectively "the Parties"), through their undersigned
 4 counsel, hereby stipulate as follows:

5 WHEREAS, Cooperative Entertainment filed its complaint on September 25,
 6 2019 (Dkt. 1);

7 WHEREAS, the Parties stipulated to extend the deadline for Ripple to
 8 respond to the complaint to January 9, 2020 (Dkt. 20);

9 WHEREAS, the Court set the Initial Case Management Conference for
 10 January 8, 2020 with the Case Management Statement due by January 2, 2020;

11 WHEREAS, Defendant presently intends to file a dispositive motion to
 12 dismiss on or before the deadline to respond to the complaint, January 9, 2020;

13 WHEREAS, the Parties wish to continue the Initial Case Management
 14 Conference to 13 days after the hearing on the dispositive motion to dismiss
 15 pursuant to Civil Order ¶ 14;

16 WHEREAS, this continuance shall not alter the date of any other events or
 17 deadlines already affixed by Court order;

18 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN
 19 THE PARTIES that:

20 1. The initial Case Management Conference be continued to after the hearing
 21 on the dispositive motion to dismiss and the Case Management Statement
 22 deadline be reset to 7 days before the initial Case Management
 23 Conference.

24 2. The Court adopt the proposed schedule below:

Event	Date
Deadline for Ripple to Respond to the Complaint	January 9, 2020
Deadline for Ripple to file a dispositive Motion to Dismiss	January 9, 2020

Deadline for Cooperative Entertainment to file an Opposition to the Motion to Dismiss	January 23, 2020
Deadline for Ripple to file a Reply in Support of its Motion to Dismiss	January 30, 2020
Hearing on Dispositive Motion to Dismiss	February 13, 2020
Deadline for Parties to file the Joint Case Management Statement	February 19, 2020
Initial Case Management Conference	February 26, 2020

DATED: December 20, 2019 Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ David M. Grable

David M. Grable

Attorneys for Ripple Labs, Inc.

DATED: December 20, 2019 Atkins & Davidson, APC

By /s/ Todd C. Atkins

Todd C. Atkins

DOUG GOTTSTEIN
Attorneys for Cooperative Entertainment,
Inc.

1 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
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3 DATED: January 2, 2020
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6 Hon. Vince Chhabria
7 United States District Judge
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1 **ATTESTATION OF E-FILED SIGNATURE**

2 Pursuant to Local Rule 5-1(i)(3), I attest that the foregoing electronic
3 signature of Todd C. Atkins concurs in the filing's content and has authorized the
4 filing.

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6 Dated: December 20, 2019 /s/ *David M. Grable*

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